

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

BERENICE BOLANOS,

Plaintiff,

v.

KOHL'S DEPARTMENT STORES, INC.,

Defendant.

2:20-cv-00970

Honorable Judge Lynn Adelman

JOINT RULE 26(f) REPORT

The counsel identified below participated in a meeting required by the Federal Rules of Civil Procedure 26(f) via email and jointly prepared the following report. The Rule 16 telephonic scheduling conference for this matter is scheduled to occur on September 4, 2020 at 11:15 am CST before the Honorable Chief Judge Lynn Adelman. Attorney Alexander J. Taylor will appear telephonically for Plaintiff. Attorney Michael Tuchalski will appear telephonically for Defendant.

1. Nature of the Case. The instant action primarily centers on allegations that Defendant violated the Fair Debt Collection Practices Act, 15 U.S.C. §227 *et seq* ("FDCPA") and the Telephone Consumer Protection Act ("TCPA") under 47 U.S.C. §227. Plaintiff alleges that Defendant continuously called Plaintiff's cellular phone after she demanded it cease calling.
2. Possibility of Settlement. Plaintiff has tendered a settlement demand to Defendant.
3. Motions. There are currently no Motions pending before the Court.
4. Amendment to the Pleadings and Joining Parties. The parties propose a deadline of **October 19, 2020** to bring any motion to amend the pleadings or join additional parties.

5. Initial Disclosures. Plaintiff provided her Initial Disclosures on August 28, 2020. Defendant proposes to make initial disclosures under Rule 26(a)(1) on or before **September 11, 2020**.
6. Length of Trial. If a trial is necessary, the parties believe that it would take no more than two (2) days. Plaintiff has demanded a jury trial.
7. Electronically Stored Information. At this time, the parties do not anticipate any special issues related to the discovery of electronic information but will promptly address any issues that do arise during the course of discovery. If there is electronically stored information responsive to the parties' written discovery requests, the parties will produce the information via .pdf format. Additionally, the parties reserve the right to request the information in native format if deemed necessary.
8. Confidentiality. The parties will make a good faith effort to resolve any disputes concerning confidentiality or claims of privilege. The parties may submit a request to the Court for entry of a protective order regarding the same.
9. Orders. The parties do not contemplate any additional orders at this time aside from the Scheduling Order.
10. Discovery Plan. The parties anticipate that all discovery can be completed by **June 22, 2021**.
 - a. Subject on which discovery may be needed:
 - i. The communications between the parties;
 - ii. Defendant's telephone systems;
 - iii. Defendant's statements to Plaintiff;
 - iv. Plaintiff's telephone records;

- v. Information Plaintiff provided to the Defendant;
 - vi. Plaintiff's damages;
 - vii. All subjects reasonably related to the pleadings.
- b. The parties anticipate that discovery may include written interrogatories, requests for production of documents, requests for admissions, requests from third-parties, lay witness depositions, and expert depositions.
- c. The parties agree that the timing, extent, and limitations on discovery shall be those set forth in the Federal Rules of Civil Procedure and the Court's local rules.
- d. Expert Discovery:
- i. Plaintiff proposes to make proponent expert disclosures by **March 23, 2021**.
 - ii. Defendant proposes to make expert disclosures by **April 20, 2020**.

11. Dispositive Motions. On or before **August 3, 2021** the parties may file dispositive motions.

The time for filing response and reply briefs will be pursuant to local rules.

Dated: September 1, 2020

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